

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: FRANK TOROK, JOANN TOROK	:	No.: 16-16181-REF
Debtor.	:	CHAPTER 13
FRANK TOROK, JOANN TOROK,	:	
Movant,	:	
v.	:	
ALLY BANK ,	:	
Respondent.	:	

CERTIFICATE OF NO RESPONSE

1. On January 31, 2017, a motion to avoid lien was filed on behalf of the Debtor(s).
2. Amended notice of motion was filed on February 1, 2017.
3. As of March 1, 2017, no response has been filed by any party.

WHEREFORE, no objection being filed the Debtor(s), request the Court grant their motion to strip junior lien.

Date: 3.1.2017

Respectfully submitted,

/s/ Matthew Mugno
Matthew Mugno, Esq.
Attorney ID: 208328
Caffese Law Firm
803 Main Street
Stroudsburg PA 18301
Phone: 570.730.4670
matt@jrcfirm.com